

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**EASTERN PROFIT CORPORATION LIMITED,**

**Plaintiff/Counterclaim Defendant,**

**Case No. 18-cv-2185**

**v.**

**STRATEGIC VISION US, LLC,**

**Defendant/Counterclaim Plaintiff.**

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**MEMORANDUM IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT'S  
MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant/Counterclaimant Strategic Vision US, LLC (“Strategic Vision”), pursuant to Section 15(a) of the Stipulated Protective Order Governing Designation and Disclosure of Confidential Information, ECF 40 (“Protective Order”), has moved for leave to file under seal two letter motions being submitted in the above-captioned action pursuant to Rule 1(F) of the Court’s Individual Practices Rules.

Both letter motions follow a deposition taken on August 2, 2019 of non-party witness Guo Wengui, a/k/a Miles Guo, a/k/a Miles Kwok (“Guo”). Both motions describe Guo’s responses to questions at the depositions, and one motion also quotes from and describes testimony from the January 31, 2019 Fed. R. Civ. P. 30(b)(6) deposition of Plaintiff Eastern Profit Corporation Limited (“Eastern Profit”) representative Yvette Wang. Wang’s transcript has been designated as confidential by Eastern Profit. Guo, too, has requested that the testimony be treated as confidential under the Protective Order, which itself treats the testimony as confidential for 21 days after the official transcript has been prepared pursuant to Section 5(a) of the Protective Order. The official transcript has not yet been prepared as of the date of this motion.

In accordance with the Protective Order, Strategic Vision seeks leave to submit the two letter motions under seal. The relief they seek necessarily is placed within the context of portions of these deponents' testimony, and the motions understandably either quote from the testimony or describe it in detail. There are no reasonable alternative means to present the confidential information to the Court, and it is important for Strategic Vision to provide concrete examples of the discovery concerns for which the letters motions seek relief. Therefore, Strategic Vision seeks leave to file under seal so that it may fully comply with the Protective Order entered in this case.

Dated: August 6, 2019

Respectfully submitted,

GRAVES GARRETT LLC

s/ Edward D. Greim

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ATTORNEYS FOR

DEFENDANT/COUNTERCLAIM PLAINTIFF

**CERTIFICATE OF SERVICE**

This certifies that the foregoing was served via the Court's Electronic Case Filing System on the date of filing, August 6, 2019, to all counsel of record. This also certifies that the foregoing complies with the formatting requirements of this Division and that the foregoing contains 290 words. Due to the brief length of this submission, no table of contents or table of authorities has been included.

*s/ Edward D. Greim*  
Attorneys for Defendant/Counterclaim Plaintiff